

EXHIBIT 2

**IN THE UNITED STATES DISTRICT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**PAUL WILLOUGHBY, PHILLIP)
DAVIS, JAMIE STEPHENSON)
)
Plaintiffs,)
) **Civil Action File No.**
v.) **1:13-CV-3910-SCJ**
)
YOUTH VILLAGES, INC.)
)
Defendant.)**

DECLARATION OF DOUGLAS R. KERTSCHER

I, Douglas R. Kertscher, declare as follows:

1. My name is Douglas R. Kertscher. I am over twenty-one (21) years of age, laboring under no physical or mental disabilities and am competent to make this declaration. I have personal knowledge of the matters set forth herein and if called to testify, I could and would competently testify as follows:
2. I am lead counsel to Plaintiffs in this matter. I am licensed to practice law in the State of Georgia and in good standing with the Georgia State Bar Association and have been practicing law in the area of Labor and Employment law since 1994.

3. A detailed itemization of Hill, Kertscher & Wharton LLP's submitted fees is filed simultaneously herewith as Exhibit 1 to the Motion. All of these fees claimed in this action are correctly stated and were necessarily engaged in as part

of prosecuting this case. The time spent in this case by Plaintiffs' counsel was absolutely necessary to prosecute this case and represents a reasonable fee for successfully litigating an employment case in this community. The attorney and legal assistant hours were all reasonably expended in the prosecution of this case, and these billing records do not include any unnecessary duplication of efforts. The legal assistant time for which Plaintiffs seek compensation reflects only a fraction of the actual legal assistant time spent in this case, as hours for purely administrative tasks were not included in Plaintiffs' Fee Motion.

Plaintiffs' Hourly Rates and Fees are Reasonable

4. Plaintiffs' counsel set their rates for attorneys and staff members based on a variety of factors, including among others: the experience, skill, and sophistication required for the types of legal services typically performed; the rates customarily charged in similar matters in the case jurisdiction; and the experience, reputation, and ability of the attorneys and staff members.

5. The standard hourly rates billed by Plaintiffs' counsel Doug Kertscher (1994 graduate, cum laude) in employment cases is \$400 an hour. Julie Burke is a 2011 graduate (summa cum laude) of the University of Georgia School of Law and her standard rate at our firm is \$250 an hour. Travis Cashbaugh is a 2014 graduate of the University of Georgia School of Law and his standard rate at our firm is \$200 an hour.

6. These rates are consistent with the skill and experience of the attorneys in this case and the amounts charged by attorneys engaged in comparable law practice in the Northern District of Georgia. These rates are reasonable and customary in this district and division for attorneys of comparable skill and expertise in similar matters.

Plaintiffs' Costs are Reasonable.

7. Plaintiffs' counsel also incurred a total of \$ \$75,471.94 in litigation expenses and costs. Copies of the available invoices are attached to the Motion as Exhibit 4.

8. These litigation expenses and costs incurred in this action are reflected in the books and records of Hill, Kertscher & Wharton, LLP. These books and records are prepared from expense reports, vouchers, check records, credit card receipts, invoices and other source materials and are an accurate record of the expenses incurred.

9. All of these costs and litigation expenses claimed in this action are correctly stated and were necessarily obtained for use in the case.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on this 2nd day of May, 2016.

By: /s/ Douglas R. Kertscher

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